

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
	:	
Taberna Capital Management, LLC, and Larry	:	
Lattig, Litigation Trustee for the First Magnus	:	
Litigation Trust, as Successor in Interest to	:	
Taberna Capital Management, LLC and The Bank	:	
of New York Mellon Trust Company, N.A.,	:	
Solely in its Capacity as Trustee under the	:	No. 08-cv-11355 (DLC)
Indenture and Property Trustee for the First	:	
Magnus TPS Trust,	:	DECLARATION OF JAMIE R. WELTON IN
	:	SUPPORT OF PLAINTIFFS' OPPOSITION
Plaintiffs,	:	TO DEFENDANT'S MOTION FOR
	:	SUMMARY JUDGMENT
-against-	:	
	:	
Gurpreet S. Jaggi,	:	
	:	
Defendant.	:	
-----X	:	

1. My name is Jamie R. Welton. I am over eighteen (18) years of age and am fully competent and authorized to execute this Declaration. The matters stated herein are true and correct and within my personal knowledge.

2. I submit this Declaration in support of Plaintiffs' Opposition to Defendant's Motion for Summary Judgment.

3. I am a partner at the law firm of Lackey Hershman, L.L.P., and I am co-counsel for Taberna Capital Management, LLC ("Taberna"), and counsel for Larry Lattig, Litigation Trustee for the First Magnus Litigation Trust, as Successor in Interest to Taberna Capital Management, LLC, and The Bank of New York Mellon Trust Company, N.A., Solely in its Capacity as Trustee under the Indenture and Property Trustee for the First Magnus TPS Trust in the above-captioned matter.

Authentication of Documents

4. In addition to my representation of Plaintiffs in the above-captioned matter, I am counsel for Larry Lattig, Litigation Trustee for the First Magnus Litigation Trust (the “Litigation Trustee” and the Litigation Trust”), appointed pursuant to the Second Amended Plan of Liquidation Filed by First Magnus Financial Corporation (the “FMFC Plan” and “FMFC,” respectively) in *In re First Magnus Financial Corporation*, Case No. 4-07-bk-01578, pending in the United States Bankruptcy Court for the District of Arizona (the “FMFC Bankruptcy Case”).

5. In accordance with the FMFC Plan, the Litigation Trustee and his representatives, including myself, have access to and have reviewed various books and records of FMFC, including, but not limited to, FMFC’s electronic data, as such records were maintained by FMFC in the ordinary course of business and Bankruptcy Case, and thereafter, by the Liquidating Trustee for the First Magnus Liquidating Trust.

6. Attached hereto as Exhibits 1-156 are true and correct copies of the documents identified below. Any documents labeled “GT” were obtained from a subpoena issued to Grant Thornton, LLP, by my law firm on behalf of Plaintiffs in the above-captioned case. The excerpts from the deposition testimony identified below were taken in the above-captioned case and, where indicated, *Lattig v. Jaggi, et al. (In re First Magnus Financial Corp.)*, Adv. No.4:09-ap-00211-JMM, Case No. 4:07-bk-01578-JMM, pending in the United States Bankruptcy Court for the District of Arizona (“FMFC Action”). The reference to the “Taberna Settlement Agreement” below, the Assignment attached thereto, and the “Assignment dated April 8, 2010,” are records related to the settlement agreement reached between the Litigation Trustee, the Taberna Claimants (as defined therein), and the Liquidating Agent for the First Magnus Capital, Inc., Liquidating Trust, in *In re First Magnus Capital, Inc.*, Case No. 08-01494, pending in the United States Bankruptcy Court for the District of Arizona (“FMCI Bankruptcy Case”). All other

records were obtained from the books and records of FMFC and Taberna unless otherwise indicated.

Exhibit No. 1.	Email to Ramaj Bailey from Gary Malis, dated December 24, 2006 regarding Fraud Report 12/22/2006
Exhibit No. 2.	Email to Erik Lutz and Janet Gallo from Gary Malis, dated May 12, 2005 regarding Request for Payoff Loan #2600003113
Exhibit No. 3.	Email to Darien Evans and Douglas Lemke from Erik Lutz, dated May 2, 2006 regarding Final Report GSW #2520
Exhibit No. 4.	Email to Erik Lutz from Gary Malis, dated August 1, 2006 regarding Meeting in Tucson
Exhibit No. 5.	Email to Gary Malis from Erik Lutz, dated August 2, 2006 regarding Meeting in Tucson
Exhibit No. 6.	Letter to Gurpreet Jaggi at FMFC from Robert Charlton of Arizona Department of Financial Institutions, dated August 2, 2006 regarding Examination of License 0903297
Exhibit No. 7.	Email to Erik Lutz from Gary Malis, dated August 3, 2006 regarding More Detail Topic Request 10 th and 11 th
Exhibit No. 8.	Email to G.S. Jaggi, et al. from Erik Lutz, dated August 4, 2006 regarding Audit
Exhibit No. 9.	Email to G.S. Jaggi, et al. from Douglas Lemke, dated August 10, 2006 regarding OIG Onsite Visit to Great Southwest Mortgage for August 15-18, 2006
Exhibit No. 10.	Email to Gary Malis from Karl Young, dated August 10, 2006 regarding OIG Onsite Visit to Great Southwest Mortgage for August 15-18, 2006
Exhibit No. 11.	Arizona Department of Financial Institutions Consent Order In the Matter of the Mortgage Banker License of FMFC, dated December 1, 2006
Exhibit No. 12.	Letter to Jana Gledhill at FMFC from Joan Hobbs of U.S. Department of Housing and Urban Development Office of Inspector General, dated November 9, 2006, attaching discussion draft report

Exhibit No. 13.	Audit Report to Brian Montgomery, Federal Housing Commissioner from Joan Hobbs, Regional Inspector General, dated December 12, 2006 regarding FMFC Did Not Comply with HUD Guidelines When Operating and Managing Net Branches
Exhibit No. 14.	Declaration of Gurpreet Jaggi in Support of Debtor's Chapter 11 Petition and First Day Motions, dated August 21, 2007
Exhibit No. 15.	Fifth Amended and Restated Warehousing Credit and Security Agreement Among FMFC, Washington Mutual Bank, FA, and Lenders, dated May 31, 2004
Exhibit No. 16.	Mortgage Loan Repurchase Agreement between Countrywide Warehouse Lending and FMFC, dated November 29, 2000
Exhibit No. 17.	Loan Purchase Agreement between Lehman Brothers Bank, FSB and FMFC, dated October 31, 2001
Exhibit No. 18.	Aurora Loan Services Seller's Guide, dated March 23, 2007
Exhibit No. 19.	Master Seller's Purchase, Warranties and Interim Servicing Agreement between UBS Real Estate Securities Inc. and FMFC, dated June 1, 2005
Exhibit No. 20.	Email to G.S. Jaggi from Gary Malis, dated March 17, 2006 regarding FMF
Exhibit No. 21.	Email to Tom Bogal from Antonia Georgieva, dated March 31, 2006 regarding 2005 FMFC Bank Meeting and Audit, 2003 and 2004 First Magnus Audited Financials
Exhibit No. 22.	Email to Tom Bogal from Matthew Thrasher (cc G.S. Jaggi, et al.), dated July 14, 2006 regarding Due Diligence Response Questionnaire, Exhibits, and Document Request
Exhibit No. 23.	Email to G.S. Jaggi, et al. from Andrea Burton (cc Douglas Lemke), dated August 7, 2006 regarding Arizona Dept. of Financial Institutions Report of Examination dated 08/02/06
Exhibit No. 24.	Email to G.S. Jaggi from Karl Young, dated October 13, 2006 regarding Message from Jim Panepinto
Exhibit No. 25.	Officer Certificate for FMFC by Gary Malis, dated September 30, 2006
Exhibit No. 26.	Email to G.S. Jaggi, et al. from Joel Herk, dated July 7, 2006 regarding FMFC Corporate OIG Audit

Exhibit No. 27.	Joel Herk Attorney's Notes, dated July 18, 2006 regarding OIG's Interview of Erik Lutz
Exhibit No. 28.	Email to G.S. Jaggi, et al. from Douglas Lemke, dated October 16, 2006 regarding Finding Outline – OIG Review of First Magnus' Net Branch Operations
Exhibit No. 29.	Letter to Jana Gledhill at FMFC from Joan Hobbs at U.S. Department of Housing and Urban Development, Office of Inspector General, dated November 9, 2006, attaching Discussion Draft Report
Exhibit No. 30.	Audit Report to Brian Montgomery, Federal Housing Commissioner and Henry Czauski, Departmental Enforcement Center from Joan Hobbs, Regional Inspector General for Audit, dated July 14, 2008 regarding FMFC Violated the Real Estate Settlement Procedures Act When Paying Incentives to Brokers for Generating Federal Housing Administration Mortgages
Exhibit No. 31.	Email to G.S. Jaggi from Gary Malis, dated November 3, 2006 regarding Hi
Exhibit No. 32.	Letter to Carl Fornaris at Greenberg Traurig from Jacquelyn Milot of FDIC, dated October 3, 2006
Exhibit No. 33.	Email to Gary Malis from Jasjit Chopra, dated February 16, 2007 (8:55 p.m.) regarding Covenant Concern
Exhibit No. 34.	Email to Gary Malis from Jasjit Chopra, dated February 16, 2007 (9:25 p.m.) regarding Covenant Concern
Exhibit No. 35.	Email to N. Wright from G. Malis, dated February 20, 2007 regarding "oversight"
Exhibit No. 36.	Email to G.S. Jaggi from Gary Malis, dated February 21, 2007 regarding \$35MM Subordinated Loan
Exhibit No. 37.	Email to G.S. Jaggi from Gary Malis, dated February 15, 2007 regarding "good news"
Exhibit No. 38.	Email to G.S. Jaggi from Gary Malis, dated March 19, 2007 regarding Lehman Figures Update
Exhibit No. 39.	Email to Paul Szymanski from Gary Malis, dated May 29, 2007 regarding April 2007 Reserve
Exhibit No. 40.	Email to Gary Malis from Jana Gledhill, dated August 2, 2007 regarding ALS List

Exhibit No. 41.	Letter to G.S. Jaggi at FMFC from Kim Nunley of Grant Thornton, dated September 13, 2005 regarding Engagement Letter
Exhibit No. 42.	Letter to G.S. Jaggi at FMFC from Kim Nunley of Grant Thornton, dated November 15, 2006 regarding Engagement Letter
Exhibit No. 43.	Letter to Grant Thornton from FMFC, dated March 8, 2006 regarding financial statements
Exhibit No. 44.	Letter to Grant Thornton from FMFC, dated March 28, 2007 regarding financial statements
Exhibit No. 45.	Email to Jasjit Chopra and G.S. Jaggi from Gary Malis, dated April 21, 2005 regarding GT Letter
Exhibit No. 46.	Exhibit H, Compliance Certificate for FMFC dated September 10, 2006
Exhibit No. 47.	Exhibit H, Compliance Certificate for FMFC dated April 11, 2007
Exhibit No. 48.	Exhibit H, Compliance Certificate for FMFC dated October 12, 2006
Exhibit No. 49.	Exhibit H, Compliance Certificate for FMFC dated July 9, 2007
Exhibit No. 50.	Operations Organizational Chart for First Magnus dated May 19, 2005
Exhibit No. 51.	FMFC's Consolidated Financial Statements dated December 31, 2005
Exhibit No. 52.	FMFC's Consolidated Financial Statements, dated December 31, 2006
Exhibit No. 53.	Email to Paul Cisneros from Gary Malis, dated August 7, 2006 regarding Message from Paul Cisneros
Exhibit No. 54.	Email to G.S. Jaggi from Karl Young, dated October 13, 2006 regarding Message from Jim Panepinto
Exhibit No. 55.	Email to Ramaj Balley from Gary Malis, dated December 24, 2006 regarding Fraud Report 12/22/2006
Exhibit No. 56.	Email to Ron Gapp from Gary Malis, dated January 3, 2007 regarding Oct 2006 SW Retail P&L Recon
Exhibit No. 57.	Email to Jana Gledhill and Emily Vondrak from Gary Malis, dated January 18, 2007 regarding 2005 Reserve
Exhibit No. 58.	Email to Jana Gledhill from Gary Malis (cc Amber Adil), dated January 26, 2007 regarding ALS EPDs

Exhibit No. 59.	Email to G.S. Jaggi from Gary Malis, dated February 15, 2007 regarding “good news”
Exhibit No. 60.	Email to Jana Gledhill from Gary Malis, dated February 22, 2007 regarding S&D Price from ALS
Exhibit No. 61.	Email to Gary Malis from Jasjit Chopra, dated March 6, 2007 regarding Reserve
Exhibit No. 62.	Email to Gary Malis from Douglas Lemke, dated March 14, 2007 regarding Questions
Exhibit No. 63.	Email to G.S. Jaggi from Gary Malis, dated April 27, 2007 regarding Hey
Exhibit No. 64.	Email to G.S. Jaggi from Gary Malis, dated July 24, 2007 regarding Lehman Report 7-24-07
Exhibit No. 65.	Email to Jasjit Chopra from Gary Malis, dated January 10, 2007 regarding Cash Position
Exhibit No. 66.	Email to Jan Stickle from Gary Malis (cc Jasjit Chopra), dated January 11, 2007 regarding December Losses
Exhibit No. 67.	Email to Gary Malis from Paul Cisneros, dated June 29, 2007 regarding May Losses, June Preliminary Losses Detail
Exhibit No. 68.	Email to Marlene Andrews and Debbie Lennon from Duane Litogot, dated August 21, 2007 regarding First Magnus Financial – Health Plan
Exhibit No. 69.	Email to Barney Holtzman from Jason Lutz (cc Erik Lutz, et al.), dated August 25, 2007 regarding Important Notice Regarding Health Insurance Plan
Exhibit No. 70.	Email to Nathan Wright from Gary Malis (cc Douglas Lemke), dated February 20, 2007 regarding “oversight”
Exhibit No. 71.	Email to Douglas Lemke and Matthew Thrasher from Joel Herk, dated August 10, 2006 regarding First Magnus
Exhibit No. 72.	Email to Joel Herk and Douglas Lemke from Matthew Thrasher, dated August 10, 2006 regarding First Magnus
Exhibit No. 73.	Email to G.S. Jaggi, et al. from Douglas Lemke, dated February 27, 2006 regarding AZ DFI Net Branch Alert

Exhibit No. 74.	Email to Gary Malis and Matthew Thrasher from Douglas Lemke, dated August 11, 2006 regarding Taberna
Exhibit No. 75.	Email to Matthew Thrasher from Matthew Thrasher, dated August 10, 2006 regarding 8-10-06 Memo re Due Diligence Update (Arizona DFI Report)
Exhibit No. 76.	Email to Matthew Thrasher from Douglas Lemke, dated August 11, 2006 regarding Voice Message
Exhibit No. 77.	Memorandum to Taberna Capital Management, LLC and Kelley Drye & Warren, LLP from Matt Thrasher of FMFC, dated August 11, 2006 regarding Due Diligence Update
Exhibit No. 78.	Email to Gary Malis from G.S. Jaggi, dated August 4, 2006 regarding Erik
Exhibit No. 79.	Officer Certificate of Gary Malis for FMFC, dated September 30, 2006
Exhibit No. 80.	Email to Matthew Thrasher from Matthew Thrasher, dated July 24, 2006 regarding 07-17-06 Letter to Thomas Bogal from Taberna
Exhibit No. 81.	Email to Rita Magnusen from Matthew Thrasher (cc Douglas Lemke), dated August 11, 2006 regarding First Magnus Ancillaries
Exhibit No. 82.	Email to G.S. Jaggi, et al. from Douglas Lemke (cc Olivia Sethi, et al.), dated March 22, 2005 regarding RESPA Settlement
Exhibit No. 83.	Email to G.S. Jaggi, et al. from Douglas Lemke, dated July 5, 2006 regarding You're in the RESPA News
Exhibit No. 84.	Email to Gary Malis from Karl Young, dated August 10, 2006 regarding OIG Onsite Visit to Great Southwest Mortgage for August 15-18, 2006
Exhibit No. 85.	Email to Karl Young from Douglas Lemke, dated August 10, 2006 regarding OIG Onsite Visit to Great Southwest Mortgage for August 15-18, 2006
Exhibit No. 86.	Email to Douglas Lemke from Gary Malis, dated September 20, 2006 regarding Branch FHA Approval
Exhibit No. 87.	Email to G.S. Jaggi, et al. from Douglas Lemke, dated December 28, 2006 regarding FMFC/GSW Blurb
Exhibit No. 88.	Email to G.S. Jaggi and Douglas Lemke from C. Fornaris (cc Nathan Wright and "Bothwells"), dated August 1, 2006 regarding OTS Letter

Exhibit No. 89.	Lehman Brothers Proof of Claim, filed November 30, 2007 (obtained from PACER as entered in the FMFC Bankruptcy Case).
Exhibit No. 90.	Aurora Proof of Claim, filed December 3, 2007 (obtained from PACER as entered in the FMFC Bankruptcy Case).
Exhibit No. 91.	Countrywide Proof of Claim, filed August 23, 2007 (obtained from PACER as entered in the FMFC Bankruptcy Case).
Exhibit No. 92.	Taberna Settlement Agreement.
Exhibit No. 93.	Journal Entries showing shareholder distributions paid to Jaggi from March 31, 2006 to April 13, 2007 from FMFC's Epicor Electronic Ledger
Exhibit No. 94.	Relevant excerpt from First Magnus Financial Corporation's Statement of Financial Affairs, Exhibit 3(c) containing the earnings statement for Gurpreet S. Jaggi from August 18, 2006 through August 31, 2007 (obtained from PACER as entered in the FMFC Bankruptcy Case, Dkt. No. 177).
Exhibit No. 95.	Email from Matthew Thrasher, with the subject "Trust Preferred Securities Questionnaire," dated July 5, 2006
Exhibit No. 96.	Email from Jana Gledhill to Joel Herk discussing the HUD audit, dated July 5, 2006
Exhibit No. 97.	Compliance Certificate dated 7/3/06
Exhibit No. 98.	Compliance Certificate dated 8/31/06
Exhibit No. 99.	Compliance Certificate dated 9/30/06
Exhibit No. 100.	Compliance Certificate dated 1/31/07
Exhibit No. 101.	Compliance Certificate dated 2/28/07
Exhibit No. 102.	Compliance Certificate dated 3/31/07
Exhibit No. 103.	Compliance Certificate dated 4/30/07
Exhibit No. 104.	Compliance Certificate dated 5/31/07
Exhibit No. 105.	Letter to G. Malis from J. Balser, dated August 15, 2007 regarding Event of Default and Termination with Cause

Exhibit No. 106.	Collateral Management Agreement dated March 29, 2007 between Funding VII, Ltd. And Taberna Capital Management, LLC
Exhibit No. 107.	Taberna Preferred Funding VIII and Bank of New York Trust Company Indenture dated March 29, 2007
Exhibit No. 108.	First Magnus Capital, Inc. Junior Subordinated Note due 2036
Exhibit No. 109.	Email from K. Frappier to J. Salmon dated August 16, 2006 regarding Taberna Credit Committee Call and Report
Exhibit No. 110.	Email from T. Bogal to M. Kahn dated August 25, 2006 regarding Taberna Credit Committee Call and Report
Exhibit No. 111.	Taberna Securities Trade Ticket for First Magnus Financial Corp.
Exhibit No. 112.	Assignment of Claims dated April 8, 2010
Exhibit No. 113.	Email from N. Patronite to A. Soosaar dated August 16, 2006 attaching InSolu Inc. Report
Exhibit No. 114.	Deposition Excerpts of Gurpreet Jaggi taken on June 4, 2010
Exhibit No. 115.	Deposition Excerpts of Gary Malis taken on June 10, 2010
Exhibit No. 116.	Deposition Excerpts of Douglas Lemke taken on June 25, 2010
Exhibit No. 117.	Deposition Excerpts of Thomas W. Sullivan, Sr. taken August 31, 2010 in the FMFC Action
Exhibit No. 118.	Deposition Excerpts of Karl Young taken August 23, 2010 in the FMFC Action
Exhibit No. 119.	Deposition Excerpts of Jasjit Chopra taken August 18, 2010 in the FMFC Action
Exhibit No. 120.	Deposition Excerpts of Gurpreet S. Jaggi taken August 30, 2010 in the FMFC Action
Exhibit No. 121.	Deposition Excerpts of Gary Malis taken August 17, 2010 in the FMFC Action
Exhibit No. 122.	Deposition Excerpts of Karl Young taken June 23, 2010
Exhibit No. 123.	Deposition Excerpts of Erik Lutz taken on April 16, 2010
Exhibit No. 124.	Deposition Excerpts of Joel Herk taken on June 15, 2010

Exhibit No. 125.	Deposition Excerpts of Nona Patronite taken on June 30, 2010
Exhibit No. 126.	Deposition Excerpts of Matthew Thrasher taken on June 16, 2010
Exhibit No. 127.	Deposition Excerpts of Jack Salmon taken on March 2, 2010
Exhibit No. 128.	Deposition Excerpts of Jack Salmon taken on June 29, 2010
Exhibit No. 129.	Email from D. Lemke to G. Jaggi dated February 27, 2006 regarding AZ FI Net Branch Regulatory Alert
Exhibit No. 130.	Email from M. Thrasher to D. Lemke, et al dated August 10, 2006 regarding First Magnus
Exhibit No. 131.	Email from M. Thrasher dated August 10, 2006 attaching Due Diligence Update Memorandum
Exhibit No. 132.	Letter from G. Rudolph of Greenberg Traurig to Felecia Rotellini of ADFI dated September 1, 2006 regarding First Magnus d/b/a/ Great Southwest Mortgage; Request for Informal Settlement Conference
Exhibit No. 133.	Officer Certificate for period ending September 30, 2006
Exhibit No. 134.	Text of Voice Mail from Julie Rystand to Doub Lemke
Exhibit No. 135.	FMFC's Amended Disclosure Statement in Support of Debtor's Plan of Reorganization Dated May 29, 2008
Exhibit No. 136.	Deposition Excerpts of Thomas Bogal taken on July 22, 2010
Exhibit No. 137.	March 8, 2006 Rep Letter
Exhibit No. 138.	March 28, 2007 Rep Letter
Exhibit No. 139.	Master Repurchase Agreement by and between FMFC and Merrill Lynch Bank, USA dated November 1, 2002
Exhibit No. 140.	Commitment Letter for Mortgage Loan Repurchase Agreement by and between Countrywide Warehouse Lending and FMFC dated November 29, 2000
Exhibit No. 141.	Loan Purchase Agreement between FMFC and Lehman Brothers Bank FSB
Exhibit No. 142.	Lehman Brothers Proof of Claim, dated November 30, 2007
Exhibit No. 143.	Aurora Proof of Claim, dated December 3, 2007

Exhibit No. 144.	Email from J. Chopra to J. Moreno, et al dated March 21, 2007 regarding Allowance Memo
Exhibit No. 145.	Email from G. Malis to G. Jaggi dated February 15, 2007 regarding "good News"
Exhibit No. 146.	Email from G. Malis to J. Stickle dated June 5, 2007 regarding Losses for May – detail for risk analysis
Exhibit No. 147.	Email from G. Jaggi to G. Malis, et al dated August 14, 2007 regarding number needed from outside equity investor to keep company afloat
Exhibit No. 148.	Email from C. Fornaris to G. Jaggi, et al dated August 5, 2006 regarding conference call with Edwin Chow of OTS
Exhibit No. 149.	Email from M. Thrasher to J. Herk, et al dated August 10, 2006 regarding Taberna asking for documents and the regulatory agency not allowing disclosure
Exhibit No. 150.	Email from G. Malis to D. Lemke, et al dated March 5, 2007 regarding Payroll Account Overdrawn
Exhibit No. 151.	Email from C. Fornaris to G. Jaggi, et al dated August 1, 2006 regarding and attaching OTS Letter
Exhibit No. 152.	Declaration of Raphael Licht in Support of Plaintiff's Motion for Summary Judgment on the First Claim for Relief in the Complaint dated July 23, 2008
Exhibit No. 153.	Email from G. Malis to J. Chopra and G. Jaggi dated April 21, 2005 regarding gt letter
Exhibit No. 154.	Email from G. Malis to P. Cisneros dated August 6, 2007 regarding Merrill and haircut loans
Exhibit No. 155.	Email from D. Litogot to D. Lennon dated December 4, 2007 regarding administrative fees
Exhibit No. 156.	Email from O. Sethi to B. Holtzman, Debbie Lennon dated August 20, 2007 regarding health insurance

7. I declare under penalty of perjury as prescribed by 28 U.S.C. § 1746 that the foregoing Declaration is true and correct.

Executed this 15th day of November, 2010.

/s/ Jamie R. Welton

Jamie R. Welton
Lackey Hershman, L.L.P.
Attorney for Plaintiffs